

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

PAN AMERICAN GRAIN COMPANY INC.;  
PAN AMERICAN GRAIN MANUFACTURING  
CO., INC.

Plaintiff,

v.

BERGE BULK SHIPPING PTE. LTD.;  
WESTERN BULK CARRIERS AS; SAKAE  
SHIPPING S.A.; THE STANDARD CLUB  
U.K. LTD; NORTH OF ENGLAND  
PROTECTION AND INDEMNITY  
ASSOCIATION LTD.; NORTHSTANDARD  
LTD.

Defendants

Civil Case No. 23-cv-1581 (SCC)

IN ADMIRALTY

**NOTICE OF INTENT TO OPPOSE PLAINTIFFS' MOTION TO HOLD IN ABEYANCE  
BERGE'S MOTION FOR SUMMARY JUDGMENT**

TO THE HONORABLE COURT:

COMES NOW Co-defendant Berge Bulk Shipping PTE LTD, ("BERGE"), through the undersigned counsel and very respectfully states and prays as follows:

1. On September 20, 2024, BERGE filed a Motion for Summary Judgment and a Statement of Uncontested Material Facts, requesting that this Court dismiss plaintiffs, to wit, Pan American Grain Manufacturing Co., Inc. and Pan American Grain Company, Inc.'s (collectively, "PAG" or "Plaintiffs") First Amended Complaint with prejudice. See Dkt. No. 70 and 71.

2. Today, on October 2, 2024, Plaintiffs filed a "Motion to Hold in Abeyance BERGE's Motion for Summary Judgment" (the "Motion"). See Dkt. No. 74.

3. BERGE respectfully informs this Court that it intends to file an opposition to Plaintiffs' Motion within 14 days, as permitted by L. Civ. R. 7(b).

WHEREFORE, BERGE respectfully requests that this Honorable Court take notice of the above.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 2<sup>nd</sup> day of October 2024.

CERTIFICATE OF SERVICE: It is hereby certified that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record which are CM/ECF system participants at their corresponding e-mail addresses and which, pursuant to Local Civil Rule 5.1(b)(2), constitutes the equivalent service.

**McCONNELL VALDÉS LLC**

Attorneys for Berge Bulk Shipping PTE LTD

P.O. Box 364225

San Juan, PR 00936-4225

Tel: 787-250-2631 / 787-250-5628

Fax: 787-759-8282

s/ Henry O. Freese Souffront

Henry O. Freese Souffront

USDC-PR No. 215502

hf@mcvpr.com

s/Javier A. Aquino-Vidal

Javier A. Aquino-Vidal

USDC-PR No. 308414

jav@mcvpr.com